

Commonwealth of Kentucky

Division for Air Quality

PERMIT STATEMENT OF BASIS

Federally Enforceable Conditional Major

U.S. Smokeless Tobacco Manufacturing Limited Partnership

Hopkinsville, Kentucky.

September 17, 2002

Ben Markin, Reviewer

Plant I.D. # 21-047-00055

Application Log # 54412

Permit #: F-01-030 R1

SOURCE DESCRIPTION:

U.S. Smokeless Tobacco Manufacturing, Limited Partnership proposes a significant revision to their conditional major permit number F-01-030 issued to the facility in Hopkinsville, Kentucky. The source plans to add two fluidized-bed dryers to its processing lines. The new dryers will have higher hourly and annual emissions than the existing. The source is taking self-imposed limits to preclude the applicability of Title V requirements

REGULATION APPLICABILITY:

All applicable regulations to the emission units are listed in the permit.

COMMENTS:

Source wide emissions for Particulate Matter, (PM) and Volatile Organic Compounds (VOC) shall not exceed the respective limitations specified in the permit.

Compliance with annual emissions and processing limitations imposed pursuant to Section 1b of the material incorporated by reference in 401 KAR 52:030, Section 26, and contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

In accordance with Regulation 401 KAR 52:030, Section 10, incorporating the standard requirements reference material Section 1b, source wide emissions for Particulate Matter (PM) and Volatile Organic Compounds (VOC)] shall not equal or exceed 89.9 tons per year on a consecutive twelve (12) month total.

Generator operations shall not equal or exceed the agreed limitation of 500 hr/yr.

The permittee shall adhere to the potential emissions limitations specified in the permit.

EMISSIONS AND OPERATING CAP DESCRIPTION:

The source has the potential to be a major source for PM, NO_x and VOC emissions. However, the source has requested to be classified as a conditional major source with a

federally enforceable limit not to equal or exceed 100 tons per year. The source is limiting generator operations to 500 hours per year. In addition, the source is limiting the leaf operations and drying operations (source units 101, 102, 103, 201 and 202) to 4650 hours per year. The indirect heat exchangers will run for 8760 hours per year, and the application of pesticide fogging solution will not exceed 1440 gallons/year and 576 hours/year. This will limit the potential emissions source-wide for PM and VOC below 90 tons per year, to preclude the applicability of Title V requirements. Also, the permittee is limiting emissions from individual hazardous air pollutants (HAPs), to less than nine (9) tons per year. The operation and the application of phosphine fumigant shall not exceed 795 pounds/year and 288 hour/year respectively.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or record-keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.

PUBLIC AND U.S.EPA REVIEW

On August 2, 2002, the public notice on availability of the draft/proposed permit and supporting material for comments by persons affected by the plant was published in The Kentucky New Era, in Hopkinsville, Kentucky. The public comment period expired 30 days from the date of publication. During this time no comments were received from the general public

The proposed permit and supporting documentation were electronically transmitted to U.S. EPA on July 26, 2002. No comments were received from U.S. EPA during the 45 day comment period

A thorough analysis has been made of all relevant information available that pertains to this application. The division has concluded that the source will comply with all applicable air quality regulations and requirements. Compliance with the terms of the permit will ensure compliance with all air quality requirements.